

**TAB E**

DANIEL P. LIEBER

VS

MARQUIS MANAGEMENT

Docket No. 1:21-cv-968-JL

SCOTT WATKINS

December 21, 2022



**AVICORE REPORTING**

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE

CERTIFIED COPY

\* \* \* \* \*

DANIEL P. LIEBER, \*

v. Plaintiff, \*

MARQUIS MANAGEMENT, LLC \*  
and SELECT DEMO SERVICES, LLC, \*

Defendants. \*

\* \* \* \* \*

DEPOSITION OF SCOTT WATKINS

Zoom deposition taken by agreement of counsel on  
Wednesday, December 21, 2022, commencing at 9:26 a.m.

Court Reporter: (Via Zoom)

Michele M. Allison, LCR, RPR, CRR  
LCR #93 (RSA 310-A:161-181)

1 had two meetings with Mr. Moore and with you on January 18th  
2 and January 25th regarding accommodations she was requesting.

3 Is it true that you had those meetings with her?

4 A. No, it's not true.

5 Q. Okay. Who had the meetings? Was it him or you or  
6 neither?

7 A. January 18th, I met with Beth Anne Collopy, along  
8 with Nikolina Gobron. On January 25th, Beth Anne Collopy,  
9 was myself, Nikolina Gobron, and Chris Moore.

10 Q. And why was Ms. Gobron there?

11 A. When I conduct an investigation or I have  
12 communications, that's what -- like I said, I like to  
13 directly speak to the person without having the need to take  
14 notes, and so I asked her to come to take notes.

15 Q. I'm sorry, you're telling me that on January 18th  
16 and January 25th, you were conducting an investigation?

17 A. On January 18th was my meeting with Beth Anne  
18 Collopy in regards to an email she sent me with some issues  
19 and concerns, in which I asked her if we would like to meet.  
20 She wanted to meet on Zoom, and I said I'd rather go and meet  
21 in person; when is good for you?

22 I then told her at the end of the January 18th  
23 meeting that we were going to follow back up with her. On

1 January -- or prior to January 25th, I said I would like to  
2 go and have Chris Moore there, if that's okay with you? And  
3 she said that was fine. And so on January 25th, Chris Moore  
4 was brought into that meeting.

5 MS. BURNS: Okay. Michele, can you read my  
6 question to Mr. Watkins, please?

7 (The record was read as requested.)

8 Q. So it's just a yes-or-no answer, Mr. Watkins. Were  
9 you conducting an investigation on January 18th and January  
10 25th?

11 A. Oh, yes, Ms. Burns, yes.

12 Q. What were you investigating?

13 A. As I previously just tried telling you, I was  
14 investigating the concerns and issues that Beth Anne Collropy  
15 brought up to me.

16 Q. Okay. And what were the issues that she raised to  
17 you in either the January 18th or the January 25th meeting or  
18 both?

19 A. They were brought up on January 18th. I gave her  
20 answers on the 25th. What those concerns or issues were, is  
21 that we have email documentation as to what they were, if  
22 you'd like me to go through them one by one --

23 Q. We'll get to the documents later.

1           A.     Okay. I met with Beth Anne Collopy. I met with  
2 Irving Santos. I met with Erin Lyle, and I met with Tina  
3 Radigan. I may also have met with Matthew Tanner, but I am  
4 unsure.

5           Q.     Okay. Do you have an investigation file concerning  
6 this matter?

7           A.     I had notes, yes, that's -- that were transcribed  
8 by Nikolina Gobron.

9           Q.     Okay. I'm sorry, you have -- you have notes that  
10 were transcribed from these interviews?

11          A.     No, not from those interviews. I have notes of the  
12 initial meeting and the follow-up meeting, with my answers  
13 for Ms. Collopy.

14          Q.     So I'm sorry, are you saying you only have -- you  
15 only have notes from your meetings with Beth Anne Collopy,  
16 but not with any of the witnesses that you interviewed?

17          A.     That's what I'm saying.

18          Q.     Why are there no notes from your interview with  
19 Irving Santos?

20          A.     Because I didn't write any.

21          Q.     Why not?

22          A.     Because I didn't.

23          Q.     Sir, is there a reason that as the investigator of

1 an internal complaint of discrimination made by an employee  
2 of the company, that you would not have taken notes during  
3 the interview of an employee that you interviewed in the  
4 course of your investigation?

5 A. Because I didn't do it at the time.

6 Q. And you didn't do it ever, because there's no notes  
7 today, correct?

8 A. Correct.

9 Q. Okay. What did Mr. Santos say during his  
10 interview?

11 A. I believe he told me that Beth Anne Collopy was  
12 downloading and transferring internal information from our  
13 service to either a thumb drive or external hard drive, and  
14 he was very concerned.

15 I asked him if he had gone and deleted any Teams  
16 meeting conversations, which I didn't know what they were at  
17 the time. He said he had. I asked him why, and he said he  
18 didn't know.

19 He also told me that she was very unpleasant around  
20 the office, but he felt like he didn't have to deal with her  
21 as much, because he was not on the help desk there. That's  
22 all I recall.

23 Q. That's the entirety of what you can recall from

1 your interview of him?

2 A. That is it.

3 Q. Okay. And what did you ask Erin Lyle during her  
4 interview, and what did she say?

5 A. I asked her if she had witnessed any kind of issues  
6 within the department concerning Beth Anne Collopy and her  
7 male coworkers. She said that there were issues, but they  
8 were more personality-related issues. She did not believe  
9 that it was based off of gender or disability or anything  
10 else. It was just personality issues.

11 I asked her if she had, as a woman in the  
12 department, had any similar experiences or thoughts, and she  
13 said she did not. She said that Evgenii could be difficult  
14 to deal with, but he was like that with everyone. It just  
15 wasn't with females.

16 Q. Do you have any notes from your interview with Erin  
17 Lyle?

18 A. No, I do not.

19 Q. Anything else she said to you during that that you  
20 can recall?

21 A. That's all I can recall.

22 Q. Okay. Do you have notes of your interview with  
23 Tina Radigan?

1           A. I do not.

2           Q. Do you recall what you asked her and what she said  
3 during her interview?

4           A. I asked her the same questions I asked Erin, and  
5 she gave me basically the same answers.

6           Q. The same questions as Erin did?

7           A. Correct.

8           Q. Okay.

9           A. The same questions and the same answers.

10          Q. Okay. Do you have notes of your interview with  
11 Matthew Tanner?

12          A. No, I do not. And I cannot recall if it was during  
13 this time that I spoke to him or if it was another time.

14 That's why I said I wasn't sure.

15          Q. Okay. Why would you have been speaking to Matthew  
16 Tanner about the complaint of gender discrimination?

17          A. Because, again, he works in that department, and he  
18 would oversee it -- not oversee it, but he would witness it,  
19 if possible.

20          Q. Okay. Who was Beth Anne accusing of gender  
21 discrimination against her?

22          A. I believe that she was concerned about Evgenii,  
23 Irving, and I think she had issues with Esdras as well.